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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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**XIONGEN JIAO, an individual, QIANJI JIAO, an individual, ZHONGHUA YI, an individual, PENGFEI ZHOU, an individual, XUAMEI ZHOU, an individual,**

***Plaintiffs,***

**vs.**

**NINGBO XU, an individual, and LCL COMPANY, LLC, a Texas Limited Liability Company,**

***Defendants,***

**and**

**DONGTAI INVESTMENT GROUP, LLC, a Texas Limited Liability Company,**

**Nominal Defendant.**

**Case No.: 4:19-CV-01848**

**Judge: Hon. Keith P. Ellison**

**THE STATE OF TEXAS           §  
   §  
COUNTY OF HARRIS         §**

BEFORE ME, the undersigned authority, on this day personally appeared Ronald J. Sommers, who, being known to me and duly sworn, upon oath deposed and stated as follows:

1. My name is Ronald J. Sommers. My business address is 2800 Post Oak Boulevard, 61<sup>st</sup> Floor, Houston, Texas 77056. I am over the age of eighteen (18) years, am fully competent to testify, have never been convicted of a felony or crime of moral turpitude and am in no way disqualified from making this affidavit. I have personal knowledge of every fact contained in this affidavit and they are all true and correct.

**EXHIBIT**

**1**

2. I am the Court-Appointed Receiver for Dongtai Investment Group, LLC (“DIG”). I have reviewed business records for DIG that have been provided to me during the course of this receivership, and I— as well as my counsel, at my direction— have researched the basis for the claims that have been filed in the receivership.

3. I have reviewed records of the real estate brokers listed with the Texas Real Estate Commission (“TREC”). Goldenpalm International, LLC is not registered as a licensed real estate broker entity with TREC. A screenshot of my counsel’s search of TREC’s website, which I have reviewed, verifying this information is provided below:

License Holder Search

Search Criteria

Name or License Number

goldenpalm

City

County

License Type

Broker or Sales Agent

Zip

Email

License Status

All

SEARCH

RESET

\* In the "Name or License Number" field you can enter organization names or individual names, individual names are in the "last name, first name middle name" format.  
\*\* Partial values are allowed in all fields that allow text entry, for example "smith, j" will bring up all license holders whose last name ends smith and first name begins with j (ex. "smith, john" or "goldsmith, james").

No Matching Records

We were unable to locate any License Holders that matched the search criteria you provided.

4. Ms. Joanna Xie is not licensed as a real estate broker in Texas. Instead, Ms. Xie is licensed as a sales agent in Texas. A screenshot of my counsel’s search of TREC’s website, which I have reviewed, verifying this information is provided below:

XIE, JOANNA

PRINT LICENSE HISTORY

DISCIPLINARY ACTIONS

Sales Agent, License #681791

Email Address

joanna7911@gmail.com

Phone #

832-488-5813

Delegated Supervisor

No

License Status

Active

Expiration Date

12/31/2024

Sponsoring Broker

Name

KINGFAY, INC

Sponsor Date

12/12/2016

License #

9005004

License Type

Corporate Broker

Expiration Date

03/31/2024

Business Address

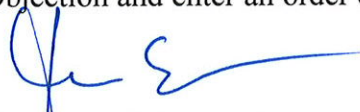
4502 Riverstone Blvd Ste 1101  
Missouri City, TX 77459

5. TREC’s website also provides questions and answers related to certain issues of real estate law. Below is a screenshot, which I have reviewed, of one such question and answer that is provided on their website as of May 12, 2023:

- Can a sales agent receive or pay a commission to a party in a real estate transaction?

No. A sales agent may not accept compensation for a real estate transaction from anyone other than the broker the sales agent was associated with at the time the commission was earned and may not pay a commission to a person except through the sales agent's sponsoring broker. [TRELA §1101.651(b) and (c)]

6. Based upon the foregoing, as well as the briefing and my initial affidavit in support of the Objection, I request that the Court sustain my Objection and enter an order disallowing the Claim in full.

  
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Ronald J. Sommers

SWORN TO AND SUBSCRIBED BEFORE ME this 15<sup>th</sup> day of May, 2023, to certify which witness my hand and seal of office.

  
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Notary Public in and for the State of Texas  
My Commission Expires:

